

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(NORTHERN DIVISION) 2011 OCT 28 P 4: 37

RBC BANK (USA)

Plaintiff/ Counter-Defendant,

v.

M. MICHAEL MASSUMI, et al.

Defendants/ Counter-Plaintiffs

CLERK'S OFFICE  
AT BALTIMORE

BY \_\_\_\_\_ DEPUTY

Case No. 1:11-cv-01351-ELH

*Approved*  
*ELH*  
*MSJ*  
*10/28/11*

\* \* \* \* \*

**JOINT STIPULATION EXTENDING TIME FOR DEFENDANTS TO FILE  
AN OPPOSITION TO PLAINTIFF'S MOTION TO DISMISS AMENDED COUNTERCLAIM  
AND STRIKE AFFIRMATIVE DEFENSES**

Plaintiff RBC Bank (USA) and Defendants M. Michael Massumi, et al., by their undersigned counsel, hereby stipulate to an extension, up to and including Monday, October 31, 2011, for Defendants to respond to Plaintiff's *Motion to Dismiss Amended Counterclaim and Strike Affirmative Defenses (Doc. No. 17)*.

*Respectfully submitted,*

/s/ Jennifer S. Lubinski  
Steven K. Fedder (Bar No. 00873)  
Jennifer S. Lubinski (Bar No. 25160)  
Leitess Leitess Friedberg + Fedder PC  
One Corporate Center  
10451 Mill Run Circle, Suite 1000  
Owings Mills, MD 21117  
(410) 581-7400  
[Steven.fedder@lfff.com](mailto:Steven.fedder@lfff.com)  
[Jennifer.lubinski@lfff.com](mailto:Jennifer.lubinski@lfff.com)

*Attorneys for Defendants*

/s/ Andrew L. Cole (jsl w/ permission)  
Andrew L. Cole (Bar No. 14865)  
Franklin & Prokopik, P.C.  
Two N. Charles St, Suite 600  
Baltimore, MD 21201  
(410) 752-8700  
[acole@fandpnet.com](mailto:acole@fandpnet.com)  
*Attorneys for Plaintiff*